

Michael Kind, Esq.
Nevada Bar No.: 13903
KIND LAW
8860 South Maryland Parkway, Suite 106
Las Vegas, Nevada 89123
(702) 337-2322
(702) 329-5881 (fax)
mk@kindlaw.com
Attorney for Plaintiff Maria Marquez de Martinez

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Maria Marquez de Martinez,
Plaintiff,
v.
Experian Information Solutions, Inc. et
al.,
Defendants.

Case No.: 2:23-cv-00716-JAD-BNW

**Stipulated Discovery Plan and
Scheduling Order Submitted in
Compliance with LR 26-1(b)**

On June 20, 2023 the first defendant appeared in this case. Accordingly, Maria Marquez de Martinez and Westlake Services, LLC (jointly as the “parties”), by and through their respective counsel, hereby submit this proposed Joint Discovery Plan and Scheduling Order. The parties will require 180 days of discovery measured from the date the first defendant answered or otherwise appeared.

PROPOSED DISCOVERY PLAN

The parties propose the following discovery plan and scheduling order:

1. Initial disclosures August 21, 2023
2. Amend pleadings and add parties .. September 20, 2023
3. Expert disclosures (initial): October 20, 2023

1 4. Expert disclosures (rebuttal): November 20, 2023
2 5. Discovery cutoff date: December 20, 2023
3 6. Dispositive motions: January 19, 2024
4 7. Pretrial order February 19, 2024

5

6 In the event that dispositive motions are filed, the date for filing the joint
7 pretrial order shall be suspended until 30 days after decision on the dispositive
8 motions or until further order of the court.

9 Pretrial Disclosures: The disclosures required by Rule 26(a)(3), and any
10 objections thereto, shall be included in the joint pretrial order.

11 Extensions or Modifications of the Discovery Plan and Scheduling Order:
12 Applications to extend any date set by the discovery plan, scheduling order, or other
13 order must comply with the Local Rules.

14 Protective Order: The parties may seek to enter a stipulated protective order
15 pursuant to Rule 26(c) prior to producing any confidential documents.

16 Electronic Service: The parties agree that pursuant to Rules 5(b)(2)(E) and
17 6(d) of the Federal Rules of Civil Procedure any pleadings or other papers may be
18 served by sending such documents by email.

19 Alternative Dispute Resolution Certification: The parties certify that they met
20 and conferred about the possibility of using alternative dispute-resolution processes
21 including mediation, arbitration, and early neutral evaluation. The parties have not
22 reached any stipulations at this stage.

23 Alternative Forms of Case Disposition Certification: The parties certify that
24 they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and
25 Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01).
26 The parties have not reached any stipulations at this stage.

1 Electronically Stored Information: The parties have discussed the retention
2 and production of electronic data. The parties agree that service of discovery by
3 electronic means, including sending original electronic files by email or on a cd is
4 sufficient. The parties reserve the right to revisit this issue if a dispute or need arises.

5 Electronic evidence conference certification: The parties further intend to
6 present evidence in electronic format to jurors for the purposes of jury deliberations
7 at trial.

8 The parties discussed the presentation of evidence for juror deliberations but
9 did not reach any stipulations as to the method as this early stage.
10

11 Dated: August 3, 2023.
12

13 **KIND LAW**

14 /s/ Michael Kind

15 Michael Kind, Esq.
16 8860 South Maryland Parkway, Suite 106
17 Las Vegas, Nevada 89123
18 *Counsel for Plaintiff Maria Marquez de Martinez*

19 **TROUTMAN PEPPER HAMILTON SANDERS, LLP**

20 /s/ Brody Wight

21 Brody R. Wight, Esq.
22 600 Peachtree Street, NE, Suite 3000
23 Atlanta, GA 30308
24 *Counsel for Westlake Services, LLC dba Westlake Financial Services*

SCHEDULING ORDER

The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for this action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: August 4, 2023